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14 BANK OF THE WEST

15 UNITED STATES BANKRUPTCY COURT  
16 NORTHERN DISTRICT OF CALIFORNIA

17 In re:

18 Daniel B. Yoon and Jeene S. Yoon  
19 Debtors.

CASE NO. 19-42763

CHAPTER NO. 11

**DECLARATION OF STEVE DENNISON  
IN SUPPORT OF MOTION FOR  
RELIEF FROM AUTOMATIC STAY**

**Date: August 14, 2020**

**Time: 10:00 a.m.**

**Courtroom: Via Tele/Video Conference**

**Judge: Honorable Charles Novack**

**R.S. No. SJK-1**

20 I, Steve M. Dennison, declare:

21 1. I am employed by Bank of the West, a California banking corporation ("BOW") in  
22 the capacity of Vice President. I am the employee of BOW primarily responsible for the collection  
23 of the monies due and owing on Loans to BOW from Defendant KS Aviation, Inc., a California  
24 corporation ("KS") and Defendant Sierra Air Center Development, LLC ("Sierra), which is the  
25

subject of the above-entitled action. The Loans were guaranteed by Debtors Daniel B. Yoon and Jeene S. Yoon (the "Debtors"), among others. As set forth in BOW's Proof of Claim herein, Debtors stipulated to judgment against them for breach of their guarantees and, pursuant to an agreement with BOW, secured their obligations under the judgment with a second deed of trust on their primary residence.

2. I make this declaration in support of BOW's motion for relief from stay.

3. Under the March 15, 2020 Order Approving Stipulation for Adequate Protection between the Debtors and BOW, the Debtors were ordered to make adequate protection payments of \$7,320 per month to BOW. The payments were to commence on March 1, 2020 and continue on the first day of each month thereafter.

4. BOW received the first payment in the amount of \$7,320 under on the Stipulated Order in early March 2020. Since then, Debtors have failed to make any of the remaining payments as required by the Stipulated Order.

5. After credit for the one payment they made in March, Debtors currently owe principal, plus interest and late fees as set forth in the table below, plus trustee's fees of \$7,451.89, for a total amount of \$1,183,834.23, in addition to unreimbursed legal fees.

Loan No.	Principal	Interest (to 7/24/2020)	Default Interest (to 7/24/2020)	Late Fees	Total	Per Diem
34	\$396,620.44	\$67,442.81	\$67,621.56	\$4,168.45	\$535,853.26	\$108.66
59	\$40,738.04	\$5,640.28	\$8,231.60	\$2,494.95	\$57,104.87	\$11.16
75	\$424,321.92	\$63,178.21	\$81,332.97	\$22,043.00	\$590,876.10	\$116.26
Totals	\$861,680.40	\$136,261.30	\$157,186.13	\$28,706.40	\$1,183,834.23	\$236.08

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this declaration was executed on this 27<sup>th</sup> day of July, 2020, at Sacramento, California.

*Steve Dennison*  
Steve M. Dennison